

**UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF WISCONSIN**

LAURA ANNE RAPP, Former Personal
Representative of the Laurence A. Berg Estate,

Plaintiff,

Case No. 17-cv-00948-bbc

v.

ANDREW J. LAUFERS, KATHERINE BROWN HOLMEN,
DUDLEY AND SMITH, PA, and JOHN DOES 1 – 5,

Defendants.

MOTION FOR PROTECTIVE ORDER

Defendants, Andrew J. Laufers, Katherine Brown Holmen, and Dudley and Smith, PA,
by their attorneys, Bell, Moore & Richter, S.C., hereby move the court to grant a Protective
Order forbidding the Plaintiff's Requests for Admission, Second Interrogatories, and Requests to
Produce Documents, pursuant to the Pre-Trial Conference Order and Federal Rule of Civil
Procedure 26(c), on the basis of the grounds alleged in the accompanying brief and supporting
affidavit of Eileen I. Dorfman.

Dated this 21st day of November, 2018.

BELL, MOORE & RICHTER, S.C.
Attorneys for Defendants, Andrew J. Laufers,
Katherine Brown Holmen and Dudley and
Smith, PA

By: **Electronically Signed by Ward I. Richter**

Ward I. Richter
State Bar No. 1014371
Sheila M. Sullivan
State Bar No. 1025532

Address:

345 W. Washington Ave., Suite 302
Madison, WI 53703-3007
Telephone: 608/257-3764
Facsimile: 608/257-3757
E-Mail: wrichter@bmrlawyers.com
ssullivan@bmrlawyers.com